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8 Attorney for: FRANCIS CLEMENT

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

FRANCIS CLEMENT

Defendant

**MOTION FOR NOTICE OF ORDER OF
PRESENTATION OF
GOVERNMENT'S TRIAL WITNESSES
AND FOR A GOOD-FAITH EXHIBIT
LIST IN ORDER OF PRESENTATION
AT TRIAL**

Date: Dec. 4, 2024

Time: 10:00 a.m.

**Place: Honorable Jennifer Thurston
Courtroom 4**

Defendant Francis Clement, though his counsel Jane Fisher-Byralsen and Jean Barrett, hereby Defendant Francis Clement, by counsel, Jane Fisher-Byralsen and Jean Barrett, hereby moves the Court to require the Government to provide a good faith list of the order of witnesses at trial and a good faith exhibit list in the order of anticipated presentation at trial.

In a case like this one, such notice is a sound trial management tool. Absent such notice, the trial would likely be subject to frequent interruptions.

Without notice there would be a risk the defense team may be unable to provide effective
1 assistance of trial counsel. It would cause a loss of efficiency, and significant jury delay,
2 inconvenience and irritation. The defense team has specific fact investigators assigned to certain
3 witnesses and counts. Without the requested notice, every single defense fact investigator will
4 have to be available in Fresno for the duration of the trial.
5

6 Respectfully submitted,
7

8 *s/Jane Fisher-Byralsen*
9 JANE FISHER-BYRIALSEN
JEAN D. BARRETT
Attorneys for Francis Clement

10 CERTIFICATE OF SERVICE

11 I hereby certify that on this 20th day of November, 2024, I served a true and correct copy
12 of the foregoing via ECF to:

13 All counsel of record

14
15 Abby Clement
16 Paralegal